UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

PUBLIC MEETING AND COMMENTS ON THE

PREFERRED CITYWIDE REMEDY

NEW DORP HIGH SCHOOL

STATEN ISLAND, NEW YORK

ADDRESSSING POLYCHLORINATED BIPHENYLS (PCBs)

PRESENT IN THE CITY'S SCHOOLS

June 9, 2014

Reported by: DANIELLE GRANT Job no: 11928

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14	TRANSCRIPT of the proceedings	
15	in the above-entitled matter being taken by	
16	DANIELLE GRANT, a Notary Public of the State	
17	of New York, held at the NEW DORP HIGH SCHOOL,	
18	New Dorp Lance, Staten Island, New York	
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Page 3 1 PUBLIC MEETING EPA PRESENTER: 2 3 JAMES S. HAKLAR, Ph.D, PCB COORDINATOR 4 5 UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 2 6 7 2890 Woodbridge Avenue, Building 10 Edison, New Jersey 08837 8 9 10 11 ALSO PRESENT: 12 DAVID KLUESNER 13 ED GERDIS GARY HUNT, TRC CORP. 14 15 SUSAN SCHULZ, EPA 16 MARK MADADALONI, EPA 17 PAT EVANGELISTA, EPA ROSS J. HOLDEN, SCA 18 19 20 21 22 23 24 25

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- 2 (THE PROCEEDING OPENED AT 6:35 P.M.
- 3 AS FOLLOWS: )
- 4 MR. KLUESNER: You can provide us
- 5 your comments by mail or e-mail. All
- 6 right.
- 7 I would just like to acknowledge
- 8 that we have Laura with comptroller
- 9 Stringer's office, and also Dan with
- 10 councilman Matthews office, so thank
- 11 you for coming out. We have a
- 12 representative of the UFT is here. I
- believe can say plural, we have parents
- 14 plural, I know we have one, thank you
- for coming, and we may have more that
- 16 just arrived.
- 17 So everybody, you know, my job is
- to sort of make you feel comfortable.
- 19 If the noise from the fan is too much
- 20 I'm going to adjust that. It sound a
- 21 little better. It was echoey at first.
- I want to make sure you can hear.
- Dan, yes?
- 24 AUDIENCE SPEAKER: Kill the fans.
- MR. KLUESNER: Yes, I'll adjust that

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our mission tonight.

in a second, and that's one of my jobs is

to make sure you can hear, to make sure

that we will be here for as long as we

need to take your comment and answer as

many questions as possible. So that's

To the extent we cannot answer the questions tonight, we will certainly get back to you and provide those answers in a responsiveness summary.

So we have a brief presentation by EPA and the City, and we'll go ahead get started and then I will ask you to hold your questions and comments until after the presentation, that will be much appreciated. If you can turn your cell phones on silent, that would also be appreciated.

All right. So thank you. With that I'll turn it over to Jim.

MR. HAKLAR: Thank you, David.

Let's start with the presentation, and

why are we here tonight? The main reason

why we're here tonight is to take or

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receive your comments on the City's plan
to address the PCBs in the school system.

And it's really, aside from making --

providing your comments tonight for the stenographer, you can also send comments by regular mail to me at this address, or you can e-mail your comments to this e-mail address right here. And these

addresses are provided on the flyers I think that are in the back of the

12 auditorium.

So let's start with a little bit of a background PCBs. PCBs are manmade chemicals, they're not naturally found. They were manufactured from the 1930s through the late '70s, and they were considered the magic chemical. They had a lot of good valuable properties for electrical properties and heat transfer properties. And they were widely used in industry and especially in the construction of buildings.

A lot of buildings that were built or renovated from the 1950s through the

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2 1970s you could have PCBs in the caulk,

3 in the floor groove, things like that.

On the not-so-good side, PCBs are hazardous and potentially cancer causing, and because of this, Congress and EPA banned the manufacture of PCBs in the late 1970s.

Now, how do we know that PCBs are in New York City schools? Several years ago there were several individuals who would walk up to schools and collect a sample of the building caulk. They would have that sample analyzed for PCBs, and when they did that they provided the results to EPA, and they also provided the results to New York Daily News. Now, when we saw the results, some of the caulk samples were very high. We knew that there was an issue here and that it was an issue that had to be addressed.

So we entered into discussions with New York City and the result of those discussions was a formal

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2 agreement which we call a consent

3 agreement. And that formal agreement

4 addresses the PCBs.

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Now, the agreement with New York

City was signed by EPA and New York

City about four-and-a-half years ago,
and it required the City to perform a

study, it's a study that we call the
pilot study. And it looked at five
older schools throughout the city, and
these older schools were known to have
PCBs in their building materials. And
based on what was found during the
pilot study, New York City prepared a

report on its findings, and that report

also has a proposed approach which is

called a preferred citywide remedy.

19 It's a proposed approach to deal with

the PCBs.

And at this point I an going to hand the microphone over to Ed Gerdis of TRC. TRC is a consultant for New York City and Ed will discuss the details of the pilot study.

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2 MR. GERDIS: Thank you, Jim. My
3 name is Ed Gerdis, I work for the New
4 York City School Construction Authority

5 as a consultant. I work for a company

6 called TRC Environmental, and we're going

7 to talk a little bit about the pilot

8 study that we performed. We're going to

9 follow this outline of this presentation,

introduction, background, talk a little

11 bit about the results, the preferred

12 citywide remedy and then some of the

long-term monitoring that we're going to

14 be performing.

15 Jim mentioned about PCBs and their

16 production. They were used widespread,

17 and not only in New York City,

18 throughout the United States. A

19 billion pounds were used between the

20 '20s and the '70s, 1.4 billion, so a

lot of PCBs were generated and used in

22 commerce, commercial products.

Beginning in the '50s, it was used in

24 caulks for its elastic properties. It

was useful to be used in caulk around,

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2 you know, that you apply around masonry

3 joints and windows and doors.

It was banned in 1978, and in 2009, so relatively recently the EPA came up with guidance relative to this issue, so it's what we consider a relatively emerging issue in the environmental industry.

There was an agreement called a CAFO, consent agreement final order. And part of that agreement included an evaluation or what was called a pilot study in five schools. Five schools were selected to evaluate with the ultimate goal of coming up with a citywide approach. and this is part of that process. We've done that work within five schools, and we've talked a little bit about that, and now we're using that information to develop a preferred citywide remedy.

I want to note that it's the first and its only kind in the nation, so although a lot of school districts

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within the nation face the same problem
and the same issue, New York because of
its size, I guess, was selected as sort
of the leader in this issue.

6 The five different remedial

caulk issue.

alternatives that were studied in the five schools included encapsulation of the caulk where you put an encapsulant on the caulk. Removal and replacement of the PCB caulk. Patch and repair of the caulk. And then window removal, and these are typical applications that we're looking to use to address PCB

This started in 2010 and during the summer of 2010 when this was ongoing we identified PCB ballasts as also a potential problem. And it turns out, because of that significance of that issue, we added that to the piolet study, so we originally were looking at caulk alone, and then in 2011 we added evaluating removing and replacement of PCB ballasts, the light fixture

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- 2 ballasts.
- These are the schools, so there
- 4 was one in each borough that was
- 5 evaluated and the various remedial
- 6 alternatives I discussed were evaluated
- 7 in each of those school, so 178 patch
- and repair, 199M remove and replace,
- 9 183Q was window replacement, 309K was
- 10 encapsulation. And what else? 3R
- 11 light fixture removal.
- 12 Essentially, after we did this
- work, we ultimately removed all the
- 14 light fixtures in each of these schools
- as well.
- The study followed an approach
- where we did some remedial activity, we
- 18 wanted to study the remedial activity,
- 19 so if it was encapsulation or patch and
- 20 repair, or removal, we took samples
- 21 before we did that and then we took
- 22 samples after we did that to see if
- there was any impact.
- We took samples in the air, of the
- dust, so we took wipe samples and then

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when outside the school as well we took

3 soil samples. And we sampled pre and

4 post remedial samples. We collected

5 pre and post remediation samples. And

6 they were collected in the same

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7 locations, you know pre and post.

And what we found is, in all the wipe samples the pre and the post were all below, with the exception of one sample which was an anomaly because we went back and retested it, we did not find that result, when we took all the pre and the post samples, they were al below the EPA guidance. EPA has guidance and regulatory limits for surface concentrations as well as guidance for air concentrations.

So what we found was when we did
the pre and the post, all of them were
below the guidance except that one
which essentially we felt that it was a
good indication that the routine
housecleaning that is being conducted
is effectively managing the issue if

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- 2 there is in fact an issue.
- We also collected air samples, pre
- 4 and post. Over 1100 air samples were
- 5 collected. And what we essentially
- found was when we did, we took the
- 7 sample, we did the remedial activity,
- 8 we saw the levels essentially generally
- 9 come down, but then when we removed the
- 10 light fixtures and the light ballasts
- 11 we saw a more dramatic impact, so that
- 12 was where this was leading, the
- information, the data was leading us to
- was we were focused initially on the
- 15 caulk, but then when we saw the
- 16 dramatic impact on the light fixtures
- we said we should really focus on these
- 18 light fixtures.
- 19 And so some of the findings that
- we found that it is a complex issue, so
- there's a number of sources of PCBs,
- there's the issue of releasing and
- 23 become secondary sources and
- 24 re-releasing.
- 25 There was a document that the EPA

1 EPA Public Meeting 06.09.14 2 published in 2012, at the end of 2012, 3 that highlights that issue. And then other issue is -- one of the key 4 findings of this that we should really 5 address the PCB light fixtures before 6 7 we address anything else because it's got the high concentrations, it's on an 8 electrical unit. They've out lived 9 their usefulness, and not only help the 10 environment, they would also, you know, 11 12 we get energy efficiency impacts as 13 well. So they should be addressed 14 first. PCB caulk needs to be managed on 15 16 an ongoing basis, and we'll talk about that. And then ultimately what we 17 found is more research is needed. 18 19 is a complex issue, it's an emerging issue, there's not a lot of information 20 21 out there. A lot of things have been 22 gained and learned as part of this 23 program, but more study needs to be

One of the big findings of this

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done.

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2 pilot study was, and one of the big

3 results was the removal and

4 replacements of all the PCB light

fixures throughout the school district.

6 So all of the light fixtures are going

7 to be removed. There is a schedule for

it, and they're all going to be removed

by December 31, 2016.

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So it's a pretty aggressive schedule. There's hundreds of buildings that have PCB light fixtures. And so I guess 238 at this point, it's a moving target, there's constantly work going on so every day there's more being done and completed, but currently

there's 238 that have been completed

and 173 that are in the process.

So ultimately we come up with the preferred citywide remedy, and that's sort of the end game, but again we still, I think, there is -- so where we are right now is the light fixture removal program is ongoing. There is a protocol that was developed to

1 EPA Public Meeting 06.09.14 2 inspect -- until that time that they're 3 all removed there's a protocol that was developed to an ongoing basis to 4 inspect and respond to any kind of 5 ballast issues that's being 6 7 implemented. There's best management practices that were developed and approved for managing the caulk in 9 10 place so an inspection of the caulk and if there are any kind issues, how to 11 12 address them, the protocols that should be followed to address those issues. 13 14 When there's a capital improvement 15 project, like a window replacement job 16 or a door replacement job or anything that might impact caulk, there is an 17 investigation that's conducted to 18 determine if that caulk that is 19 impacted is PCB containing, is it PCB 20 regulated material, and if it is, then 21 22 proper precautions are implemented to 23 remove it appropriately under 24 containment conditions, so it's a 25 controlled removal.

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In addition, as part of a capital improvement project, if there are window jobs or anything that might be impacting the exterior or the soil when the job is complete, the soil around the exterior of the building is tested, and if it is impacted it is removed and addressed through an EPA protocol.

Long-term monitoring is something that's ongoing, and so an ongoing basis we're going to be doing air sampling twice a year at a minimum in these pilot schools to monitor the progress.

Bulk sampling is going to be conducted as part of the long-term monitoring plan and also wipe sampling. But as, if you read the document, there are additional studies that we are working currently with the EPA to develop to implement on an ongoing basis to further study this issue.

With that, I'm going to turn it

MR. HAKLAR: Okay. Thank you, Ed.

back over the Jim.

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City's work.

Okay. So now the pilot study has
been completed. What were the next
steps? In accordance with our
agreement with New York City, EPA had
to conduct what's called a peer review.

of a peer review as if you were, let's say, writing a letter to somebody and you gave it to an independent party to check to make sure there were no mistakes or errors. So we had technical experts review New York

And a peer review -- you have to think

We also, in accordance with our agreement, are holding this public meeting and we're going to be having one final later on this week in Brooklyn.

So let's talk a little bit about the peer review. Peer review was independent. EPA had no direct contact with the peer reviewers. We used a consultant who managed the peer review, but we -- and any questions or

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2 information was passed through the

3 consultant to the peer reviewers.

4 There were a total of three peer

5 reviewers. Two of them were from

6 private industry or the environmental

7 field. One was associated with a major

8 university in the northeast.

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And EPA provided the -- we provided our consultant with a set of questions for the peer reviewers to answer. And before we provided our consultant with those answers, we provided them to New York City for their input.

And once the peer reviewers had completed their work, our consultant assembled the responses into what's called a peer review report. EPA reviewed that report, and we prepared our own document on our perspectives on the peer review. And both documents can be found at the web site that's provided at the bottom of the slide right over here. And that web site,

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2 again, it should be on the flyers.

So what were the major findings of the peer review? Well, if we start and we look in general terms of the City's summary report the, peer reviewers found that the report was comprehensive and that appropriate methods were used during the actual field work or the

We had tasked the peer reviewers to take a look at what it is called the City's reoccupancy protocols in the event of a light ballast failure. Now, a light ballast is an electrical component that's inside a fluorescent light fixure. The older light ballasts, the ones that are 40, 50 years old, could have these ballast components that could have PCBs in them, and if those ballasts smoke or if they leak you could you possibly have PCBs released into the area where the

investigation phase of the pilot study.

The city has an established

ballasts are leaking.

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testing.

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2 protocol to respond to those situations 3 and that protocol generally consists of evacuating the area, whether it be a 4 classroom or hallway, whatever. 5 the City provides proper notifications 6 7 to EPA and to other parties. They also, they ventilate and they clean the area, and then they perform clearance 9

Now, the clearance testing that the City performs is call wipe sampling, where you would take a gauze and wipe it along the surface of a desk or a table or the floor and to see if that gauze would pick up PCBs, and you would have that gauze analyzed at the laboratory. And we tasked the peer reviewers to look at that sampling, and some of the peer reviewers believe that wipe sampling alone for clearance is not adequate.

We also had the peer reviewers look or tasked them to suggest other options for addressing PCB caulk. You

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heard Ed Gerdis talk about the

alternatives or the methods that were

evaluated during the pilot study. Some

of the peer reviewers recommended

physical barriers such as plastic tape

or board or aluminum strips to prevent

exposure to the PCBs, or even treating the

10 caulk to reduce the amount of PCBs

11 that's present in the caulk.

And one thing you have to realize,

PCBs can move around. If you have

caulk and it's over masonry like brick

or concrete, the PCBs could move from

the caulk into the concrete. PCBs also

move from the caulk into the indoor

air. And what EPA's office of research

and development has found is that that

is the primary way that people inside a

building can get exposed to PCBs. It's

not touching a little thin bead of

caulk around a window, but it's in

actually inhaling or breathing in PCBs

that have gotten into the air.

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2 We also tasked the peer reviewers 3 to look at prioritizing schools. would you go about prioritizing schools 4 to address this situation? There are 5 potentially hundreds of schools in the 6 7 New York City school system that could have PCBs in the building materials. And I believe in the City's report, 9 there was a recommendation to address 10 it as, in the course of routine or 11 12 normal construction.

Some of the peer reviewers believe that proactively addressing the PCBs would reduce the risks of exposure, and all three reviewers believed that prioritizing based on air sampling would be an effective means of dealing with the situation.

Let's talk a little bit about ventilation, how air moves in school buildings. All three peer reviewers believed that ventilation should be made the best it possibly could be, not just for reducing concentrations of

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PCBs in the indoor air, but also for

dealing with other situations, like

conditions of let's say mold or similar

5 situations.

The one thing you have to realize is that a lot of the schools were built to have -- to have the windows open or to allow the windows open to let fresh air in. And with the newer energy efficient windows, sometimes when they're replaced they can't open and that can impact the overall ventilation in the school.

Let's look at housekeeping in the schools, and we have a special term for the housekeeping called best management practices. And at the start of the presentation I mentioned that PCBs were used in caulk, building caulk. The reason why they were used in building caulk was to keep the caulk flexible. And if you were to take a look at caulk that was along the side of a building or around a window that was installed

1 EPA Public Meeting 06.09.14 2 40 years ago and it had PCBs in it, it 3 may look like it's relatively new or that it was installed within the last 4 5 year or the last month. And what we asked the peer reviewers to look at was 6 7 do you focus on that intact caulk when you do a normal cleaning, housekeeping, do you focus the deteriorated caulk, 9 because if you go look inside a 10 building, sometimes you see caulk 11 12 that's flaking or cracking, or do you 13 look at both and the peer reviewers 14 really weren't consistent in their recommendations. One recommended 15 16 looking at intact caulk and another 17 recommended looking at both, so, so, 18 their responses were varied. And then let's move outside the 19 20 school, to the soil surrounding the 21 school. We tasked the peer reviewers 22 to look at, were proactively looking at the soil around the school, would that 23 24 significantly reduce exposures.

we believe is that PCBs that are in the

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1 EPA Public Meeting 06.09.14 2 soil around the building, around the 3 school building probably got there from old construction practices, from little 4 pieces of caulk or other building 5 material PCBs getting into the soil and 6 7 contaminating the soil. And the peer reviewers really didn't believe that 8 proactively going out now and looking 9 at the soil would significantly reduce 10 the exposure to the PCBs. And the 11 12 reason for that is, once again, the 13 main way that someone can get exposed 14 is by breathing in the PCBs from the 15 air. 16 So what are your next steps? 17 Well, we have a public comment period 18 that's open until June 30. And in accordance with our agreement with New 19 20 York City, based on your comments and 21 the findings of the peer review, EPA 22 could revise the City's preferred 23 citywide remedy. That's an option. 24 As Ed Gerdis mentioned, preferred 25 citywide remedy also recommended

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2 some -- acknowledged some data gaps,

3 and after discussing those, this issue

4 with New York City, EPA recommended or

5 suggested to New York City that

6 whatever research is done it include

7 two areas.

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The first one is to test different methods for collecting samples of the indoor air and for characterizing or trying to see -- trying to determine quickly and easily if caulk has PCBs.

The second area for research was really to refine or pin down how -- what is the contribution to the indoor air of PCBs from building materials?

We know that the light fixtures are a major source, but are they the only source or is there, or is does caulk contribute as much or nearly as much?

We don't know yet, and that's an area for further research.

Now, I'm going to start wrapping up and just a couple of points to remember. There was a lot of work done

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2 through the pilot study, a lot of good

3 work, a lot of good scientifically

really do matter to us.

4 valid work.

We do know now, we have a better understanding of where PCBs are in schools or where to look for them in schools. And as I mentioned just a moment ago, by removing the light fixtures there's a major source of PCBs that's being removed from the schools. It may not be the only source but it's a major source. And your comments

And just to recap on this, it's like a split slide, the top of the slide has the City's preferred citywide remedy and on the bottom we have where you would send comments, and actually I've looked today and I started getting comments, so that's a good thing.

So at this point I'm going to briefly hand the microphone back to David.

MR. KLUESNER: Thank you, Jim.

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- 2 Don't go anywhere.
- Okay. How is everybody doing?
- 4 Can you hear everything?
- 5 So as I mentioned at the outset,
- 6 we're here to take your comments. How
- is everybody doing over there, okay?
- 8 Okay. So at this point I would
- 9 like to open it up for any comments by
- 10 elected officials or any of their
- 11 representatives. So Councilman Landry,
- 12 will you --
- MR. LANTRY: I'm here on behalf of
- 14 Councilman minority leader Ignizio. My
- 15 name is Brendan Lantry.
- As many of you know, minority
- 17 leader Ignizio has been a leader in the
- 18 movement to remove hazardous toxic
- 19 PCB-ridden lights and ballasts from New
- 20 York City schools. In fact, as a
- 21 result of his activism in this areas as
- well as that of Christina Georgio (ph)
- and the folks in the NYLPI meeting with
- the Department of Education and the
- 25 former administration, minority leader

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Ignizio successfully lobbied the City

3 to commit to removing and ballasts and

4 commit to significantly lowering its

5 time frame for removal of the ballast.

6 Minority leader Ignizio remains

7 concerned about the PCB ingestion in

8 our schools derived from caulking

9 materials. Indeed we need accurate

10 scientific procedures to be utilized in

order to determine whether the

12 concentrations and the caulking are a

danger to those in the classroom.

The best way to conduct such a

survey is a full diagnostic testing, a

full pilot, monitoring real conditions

that our children will be placed in,

closed doors, open doors, open windows,

crosed doors, open doors, open windows,

closed windows, with air ventilation

20 both on and on off. This is the only

21 way to insure the health and safety of

our children and teachers.

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23 Minority leader Ignizio urges the

24 EPA to not rely exclusively on the DOE

report, which I understand it's not,

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and to keep an open mind from the peer reviews as well as the parents and scientists that appear before you in

5 your meetings in the five boroughs.

Of course we all, the EPA, DOE,

NYLPI, those in the council, all seek a
safe educational environment for our
teachers and students. We all should
strive to be sure that our kids are
safe and insure that by any objective
measure we have protected the health of
children and staff in our buildings.

Thank you for your time.

MR. KLUESNER: Thank you.

We have representatives from Council Member Rose, Councilman

Matteo's office, Comptroller Stringer's

19 office.

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20 Any statements or any comments at

21 this point?

Well, it open it up for comments.

23 If I can get a show of hand for how

24 many folks have a comment or a

25 question.

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Okay. If you wouldn't mind, I

apologize, you might have to walk up

4 her.

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5 AUDIENCE SPEAKER: That's okay, I'm

6 a teacher, I have a loud speaking voice.

So I don't know much about PCBs.

I'm a teacher, I work in a building for

9 more than ten years. I have children

in the public school system, I have a

grandson who is about to enter the

12 public school system.

When I hear the study took five schools out of approximately 1,700 schools, it really makes me wonder how comprehensive is the study? How do you rely on the results from five out of, you know, 1,700 schools? So that to me says that, you know, what will you find

if you test more schools.

I really want to know, are they expanding this pilot study, had they already expanded it, or are they really basing what happens with our children and our teachers on the study of only

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- 2 five schools?
- MR. HAKLAR: The pilot schools were selected to be representative of typical

5 schools across the city. At this point,

6 the pilot study is, aside from the

7 additional suggested research, the pilot

8 study is for the most part done, and at

the moment its testing is not being

10 expanded.

Does the City want to comment on

12 this?

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AUDIENCE SPEAKER: Can I just add,

just to follow-up to your comment. I

worked in a school initially for the

16 first maybe seven years that was built,

if I'm not mistaken, I think 1925. I

have a son who graduated from a school

19 building that was brand new built in

20 maybe 2008 or 2009. So there really it

is no way -- and I mean, I'm sure that

there are, you know, far in between from

23 1925 to very currently built schools, so

I don't see how taking one school from

25 every borough can give you a realistic

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2 picture or say this is the norm or this

is the average, because just in one

4 individual my experiences in public

5 schools are vastly different in one

6 borough.

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MR. HAKLAR: And Again, I guess for more thorough explanation, I'm going to have to defer to the School Construction Authority.

MR. HOLDEN: My name is Ross Holden, 11 12 I'm with the School Construction 13 Authority. So I think early on in the 14 presentation showed that the history of PCBs and when they were used 15 16 predominantly in buildings, not just in 17 schools, not just in the City, but everywhere, and it was in 1950 until 18 1978. 19

So if the school was built during that time or any building was built during that time or had a massive large major renovation done during that time, that is a potential building that you would want to either include in the

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2 pilot program or have schools like it

included in the pilot program, which is

4 exactly what we did. We took schools

during that period of time that were

6 built between 1950 and 1978. After

1978 they weren't making PCBs anymore?

AUDIENCE SPEAKER: Not even in the

9 lights?

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MR. HOLDEN: No. The lights are older -- PCBs were banned in 1978 so they haven't been manufactured since that period of time. If lights were installed during the period of time 1950 to 1978, those are the lighting fixures that are being removed now by the City of New

So what we did was we looked at schools that were built during that period of time, that 25 year period of time. We took some that were built in the early stages because materials used in the 1950s and '60s were different than 1970, so we looked at the vintage of the school first and then we also

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- 2 looked at the ventilation systems.
- 3 Some of them that were built in
- 4 the latter part of the PCB era have
- full HVAC systems and -- central air
- 6 conditioning, so we looked at those.
- 7 And then we looked at some that were
- 8 built prior to the time that central
- 9 air conditioning was put into the
- schools, and those schools ventilate in
- a different ways, through exhaust fans
- on the roof. So we wanted to see how
- those schools were.
- 14 So with our collaboration with
- 15 EPA, we came up with criteria, and we
- tried to find a cross section of
- buildings that would be representative
- of those built during 1950 to 1978 that
- 19 we could use as a, kind of a
- 20 laboratory, if you will, for testing
- 21 materials, removing lights and doing
- the other things to try to control PCBs
- in the classroom environment.
- MR. KLUESNER: Thank you, Ross.
- 25 Any other comments or questions?

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2 MS. ORLANDO: I'm a parent. Some of 3 you might remember me from years ago at P.S. 53. So, I guess all these years 4 out, we've kind of figured out that the 5 lights were a problem and we're taking 6 7 them out of the schools in what was a ten year time period but was reduced it to a 8 two year, or roughly, 2016. 9

> Do you think that the lights is an easier fix than the caulk is going to prove to be, if we determine that the caulk is the issue or another source? Because I think I looked in P.S. 3, maybe it was April of 2012, and right after the lights were removed, some of the air was still coming up with high PCBs or higher or slighter higher than the EPA standards in one of the hallways. And they duplicated like opening the door and shutting the door and retesting the air, and what they found was that it was, again, caulk, indoor caulk at that time, that was emitting, and so they encapsulated

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2 that; is that right?

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done?

3 So if we take all the lights out of the building and we still have the 4 caulk and we are finding that it is 5 emitting or it's, you know, fryable or 6 7 it's damaged, like is that going to be something that we can really control 8 and is that what the next step is? 9 That's the first part of it, and I know 10 we're studying it and we're figuring 11 12 out how to handle it. And I think 13 we've determined that ventilating the 14 buildings is a great help. Opening 15 windows and HVAC or cleaning it, or 16 containing it, I mean, is that the push 17 of all this? Are we going to make sure 18 that we have proper ventilation in all 19 the schools, that it's still going to 20 have PCB caulk in it, whether it's 21 internally or externally. I know it's 22 still there. And in P.S. 3 are we 23 still going to do the windows or is 24 that a project that was done or not

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replacement only.

Because I think it was supposed to

have the windows, but then halfway

through we determined that it was the

lights that were the problem, so that

school became the pilot for the ballast

And how are we on windows with the rest of the city, are we still doing window jobs and how are we cleaning the air? Are they testing the schools when they're doing it?

MR. KLUESNER: Do you have answers, or do you have --

MS. ORLANDO: I'm done.

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16 MR. HAKLAR: Patty, you're going to
17 have to remind me if I miss or forget one
18 of your questions.

I think your first questions was how difficult is it going to be to deal with caulk versus the light fixtures.

Light fixtures is, it's a straightforward solution, the old light fixtures, they have, they could have

PCBs, you remove them, that takes cares

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- of that.
- 3 Caulk is a little more of an
- 4 issue. As I mentioned during my part
- of the presentation, caulk, we still
- 6 have to determine -- we still have to
- 7 get a handle what is the contribution
- 8 of caulk, of the PCBs in the caulk to
- 9 the indoor air.
- 10 Are there ways of preventing the
- 11 PCBs from moving from the caulk into
- the indoor air? If you have a light
- fixture, it's very easy to remove. If
- 14 you have a bead of caulk.
- I can tell you about just briefly
- about a project that I had, a building
- that a 25,000 linear feet of caulk.
- 18 That's a little more challenging and it
- 19 wasn't a school, it was a commercial
- 20 building, but it's still a little more
- 21 challenging from a -- than removing the
- 22 light fixures. I think that was your
- 23 first question.
- 24 Could you remind me of your second
- 25 question.

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2 MS. ORLANDO: The ventilation.

MR. HAKLAR: Ventilation, the

4 question was about the whole issue of

5 using ventilation to reduce the

6 concentrations. Ventilation is a very

7 good thing to do, but it's not the only

8 thing. We are considering the

9 ventilation to be one component of what's

10 ultimately going to be a multi component

11 solution, whether that includes the

12 housekeeping, the best management

practices, whether it includes something

else, but it's one thing, it's a good

15 thing but we realize with hundreds of

schools, ventilation is a significant --

is a significant way to go.

18 Your third question was?

19 MS. ORLANDO: Are there a lot of

windows jobs being done and testing the

air, we know it's contributing to PCBs in

that building in addition to lights, are

lights being done?

MR. HAKLAR: I'm going to look at

25 the School Construction Authority as I

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- 2 respond to this.
- 3 The questions was: are there still
- 4 window replacement jobs going on in the
- 5 city and the answer is yes. I'm seeing
- 6 the School Construction Authority
- 7 nodding yes. And during the job is the
- 8 air being tested?
- 9 MR. HOLDEN: To answer your question
- about window replacement projects, those
- are -- it's a major category of work
- 12 throughout the city of New York, not just
- in buildings that may have PCBs, but
- because the average age of a New York
- 15 City's public school is 65 years, windows
- need to be replaced, a lot have the old
- 17 wooden ones.
- 18 So whenever the SCA does a window
- 19 replacement project, we first retest
- 20 the caulk to see whether or not it has
- 21 PCBs. We do that for two reason. One
- is we want to handle it in the
- 23 appropriate manner during in the
- 24 removal of the windows. And two, the
- 25 window and the caulk need to be

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disposed of in the proper way, so if

3 there is PCBs in the caulk, then that

4 has to go to a different landfill than

5 if there was not.

single year.

So yes, you can count on the School Construction Authority for structural reasons, but, of course, the good part of that is that whenever we do a window replacement project, the caulk, and that's where much of the caulk is found, is removed along with the windows so we will continue to do many windows replacement projects every

MS. ORLANDO: Is it affecting the indoor air or we don't necessarily test the indoor air.

MR. HAKLAR: No, we don't test air, we will test the bulk product, the caulk, to see whether or not there is PCBs in it. And we go on from there. Sometimes we've done wipe samples under certain circumstances. We are, as part of the pilot program looking at different air

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testing methodologies, that's something

3 that we're working with the EPA on now,

4 but it's part of the continuing research

5 that Jim Haklar and Ed Gerdis were

6 mentioning earlier.

7 MR. KLUESNER: Thank you.

8 Next comment or question?

9 Would you like to come up here?

I'm sorry to make folks come up here, I

11 apologize for that.

12 AUDIENCE SPEAKER: Just a quick

13 question, I just didn't know, the pilot

14 program was paid for by the City?

MR. GERDIS: Yes.

16 AUDIENCE SPEAKER: How much did it

17 cost? Do we have an estimated cost?

18 MR. HOLDEN: I don't know exactly

19 but we're talking about millions of

dollars.

21 AUDIENCE SPEAKER: Thank you.

22 MR. KLUESNER: The next comment of

23 question?

MS. YOUNG: Hi, my name is Barbara

Young, my daughter is a student here, and

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2 I wanted to know what these light

3 fixtures are going to be replaced with.

I don't know if I missed that because I

was late.

The new energy efficient light

5 bulbs are not safe for everyone,

8 especially people with Lupus. There is

9 health concerns with those.

10 And the second part of my question

is if you're doing anything to test for

other toxins in the air such as mold.

13 It sounds like the ventilation will be

good for all toxins, but is this only

15 focused on the lights and the caulking

or all toxins?

17 MR. KLUESNER: I'm going to answer

18 your second question first. The pilot

19 study focused on PCBs because our

agreement was, that we reached with the

21 City was under what's called the Toxic

22 Substances Control Act, under which PCBs

are present.

24 So what we're talking about

25 tonight, the work pertains to

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- 2 specifically to the PCBs.
- With regard to the light
- 4 replacements, and again I'm looking to
- 5 the School Construction Authority,
- 6 they're -- the older lights are
- 7 replaced with the energy efficient
- 8 lights. We have -- I can't respond to
- 9 your comment on the health affects from
- 10 energy efficient lighting on people
- 11 with immune system compromises such as
- 12 Lupus.
- But Mark, do you want to say
- 14 something? This is Mark Maddaloni,
- 15 EPA's risk assessment.
- MR. MADDALONI: Hi, I'm Mark
- 17 Maddaloni, toxicologist.
- 18 I'm not familiar with the issue
- 19 that you're raising. If you will send
- 20 me some literature on it, I would be
- 21 glad to study it and get back to you,
- but I would need more information than
- just the association of immunologic
- Lupus or other immunological disorders
- 25 with lighting fixtures. I need to know

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2 exactly what was in these lighting

3 fixtures.

I know there's mercury, which is certainly an issue.

And so, just to expand and reiterate what Jim said, ventilation will have a lot of benefits. Yes, it's not only PCBs. Every indoor environment has a whole host of issues ranging, depending on the age of the building from asbestos, lead, other volatile organic compounds, mold, other infectious agents. There's literally a laundry list of environmental contaminants.

And one other thing I could gladly share with you, EPA has what's called a school's environmental health program. We have a great pamphlet, if you will, called Sensible Schools. And it goes through in great detail all of the environmental health issues that could be encountered in the schools and how to deal with them. So I'll be glad to

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follow-up after the meeting and get you

3 some really good literature on all the

4 other things in addition to PCBs that

5 you should be thinking about if you

6 have a child in a public school or a

7 parochial school or any school.

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MR. KLUESNER: And also just to say one point, final thing. If there's a question tonight that we cannot answer, just to answer, you know, immediately, we will look into it and we will respond in our response in the summary.

MR. HAKLAR: Thank you, Mark, for the offer. I'll have in the back, if you want information mailed to you, put your name and address and we'll get it to you that way.

Thanks. Next comment or question?

AUDIENCE SPEAKER: I have another

question. I think someone said that

there were 1100 air sample collected; is

that correct? Were those 1100 samples

only taken in the five schools in the

pilot study or were they from schools all

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2 across the city?

MR. HOLDEN: Only five schools.

4 AUDIENCE SPEAKER: Okay. And can

5 anyone speak to how the samples, like the

6 specifics on how the samples were

7 collected, because, I mean, I just know

from, you know, my own experience, if I

9 come into the building, you know, at 7:45

in the morning, the building has been

11 closed, the air conditioning has not been

on overnight, sampling at that time might

give you a complete different number than

if you sample at 12 o'clock in the

15 afternoon or 3 o'clock after the day is

done and the air conditioning has been on

or windows have been open.

18 So can anyone speak to how the air

19 sampling was done?

MR. KLUESNER: Ed, do you want to

21 come up and just give a brief

22 explanation?

MR. GERDIS: Yes. So we try to do

the air sampling representative of normal

building conditions, so, in the winter,

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for instance, and depending upon how the school operates. Some schools have HVAC systems, so those schools, they don't open up the windows. The HVAC cools it when it's warm and heats it when it's cold. So in that case, we just take the

samples under normal conditions.

We have tried to -- you know, we can't sample when the kids and the teachers are in the actual room, there's a sampling pump, there's a tripod and a stand and it's actually a glass tube. It is hung from the tripod at breathing zone height to try to represent the exposure that someone might, you know, the breathing zone of the child or of a person.

So that's what -- we set the samples up, we let them run for approximately six-and-a-half, seven hours, in that time frame. They're calibrated before and after we do our sampling. We get the flow rate of air that's actually drawn across the media

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can convert it to the concentration

that was in the air during that time

and then calculate the volume of air that's been drawn and that goes with the sample. The chain of custody to the laboratory. The laboratory then analyzes the sample and provide the information and we've been sending it to an independent laboratory to get the data back and then we get, you known we 

period.

So, the actual conditions during sample can vary. So if it's in the warmer months and it doesn't have a, the building doesn't have an HVAC system, a lot of times the way the buildings operate is you have exhaust fans on the roof that be ducted to the core of the building, then they go to the classrooms, with the concept of you open up the windows, the air comes in and gets exhausted out so there's a ventilation system, that's how they were designed.

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2 So obviously, if it's freezing 3 cold outside, people don't have the windows open so we typically close the 4 windows in the winter, and then in the 5 spring and the fall when it's nice out, 6 7 people like to have fresh air. always good for a number of reasons, 8 not only this, to have fresh air. The 9 windows are opened, cracked to allow 10 fresh air in so that ventilation can 11 12 operate as designed.

AUDIENCE SPEAKER: Thank you.

MS. YOUNG: So I couldn't really hear the response in total to my question about the energy efficient light bulbs, but I think he said he was a toxicologist and he was unaware of any health effects.

Those new light bulbs, if they break, they contain mercury. You're supposed to handle them with gloves, and if they break your supposed to have a hazmat team.

People that own them in houses don't know or do that so I don't allow

1 EPA Public Meeting 06.09.14 them in my own home, but how will I 2 know that if a lightbulb breaks in 3 school, that a hazmat team is going to 4 come clean it up, and I think that 5 could be just as or more dangerous than 6 7 what these light bulbs you're replacing Just because they're cheap are. doesn't mean they're safe. 9 10 MR. MADDALONI: No, I agree, I in 11 fact mentioned I thought you were 12 probably referring to mercury. 13 The newer generation of 14 fluorescent bulbs have a lot less 15 mercury. And I know EPA has guidance 16 on how to manage a broken bulb. 17 doesn't require a hazmat team, it 18 requires sensible steps to confine the 19 area of the breakage and try to not

And, again, I'll give you my card.

I could pass along the guidance that

EPA has on the management of broken

fluorescent bulbs, but we would like no

mercury that is there.

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spread the small, the small amount of

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exposure, but we simply couldn't

mobilize hazmat teams every time

someone broke a fluorescent bulb. It's

not possible.

6 MR. KLUESNER: Thank you, Mark.
7 Yes.

Roseann, I'm going to have ask you to stand right here and try not to move.

MS. APPLETON: Roseann Appleton,

UFT. Just if I could speak to you about what is the protocol? Are protocols listed in each school for removal of the mercury-laden bulbs, the fluorescent bulbs? I mean, does the maintenance, does everybody know how to do this?

MR. HOLDEN: You Have to speak to the City about their custodial staff. I can't really respond to that because I'm the School Construction Authority and we'll install the new light fixture, taking out the old ones, but we don't do the maintenance in the school, we don't remove light bulbs or tubes that are --

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- 2 that need to be replaced.
- 3 So we can take your concern back
- 4 to the Division of School Facilities of
- 5 the Department of Education and see if
- 6 we can get a response for you on how
- 7 what training there is for handling
- 8 that type of fixture.
- 9 MS. APPLETON: Thank you. The only
- 10 reason why I ask is because as these
- things come along, you know, we have to
- be trained, all of us, to know what's
- going on.
- 14 I'm health and safety in Staten
- 15 Island and I would like to go to my
- 16 colleagues and say yes, I know how. So
- if they know how I would like to know.
- 18 MR. HOLDEN: I agree. I should send
- 19 you our Sensible Steps brochure for
- 20 dealing with environmental health hazards
- in school. As I said there is a laundry
- list and you added one more, mercury,
- 23 yes. When florescent bulbs break,
- 24 mercury is released and it needs to be
- 25 dealt with.

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2 MR. KLUESNER: Again, I apologize

3 for the very awkward audio set up here.

4 I appreciate your patience in that.

5 More comments or questions? I

6 think the lady had had her hand up.

7 AUDIENCE SPEAKER: My name is Eileen

8 Sulfuri (ph). On Friday I received a

9 letter from my children's school that

says that the lights were leaking. I

looked at the results from the P.S. 3

12 pilot and I see that if lights and

13 ballasts that were removed were described

14 as contaminated and impacted, but I don't

15 know what that means so, Mike, if someone

16 could explain it.

17 And also so the Petridies School,

the lights will be replaced, they will

19 be given a higher priority, I wonder

20 how long that will be, what we can

21 expect and should I tell my children to

look up and don't sit under the light

in the interim?

MR. KLUESNER: So, I guess one of

25 your questions was about what to expect

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- when the light fixture project occurs.
- 3 AUDIENCE SPEAKER: I would like to
- 4 know when.
- 5 MR. GERDIS: All right, so, yeah, as
- 6 part of the -- and that was designed for
- 7 disposal, so as was mentioned earlier, or
- 8 may have been mentioned earlier, one of
- 9 the issues is when you remove these
- 10 fixture you have to properly dispose of
- them and we don't dispose of PCBs in a
- 12 landfill that's not appropriately
- designed to receive those.
- 14 So the idea is that when a ballast
- is in a fixture, over time it can leak.
- And when it does leak, it leaks into
- 17 the fixture primarily. And then so
- 18 when we open up that fixture and we see
- it has leaked, that fixure then gets
- disposed appropriately as well as the
- 21 ballast. So if the fixture it's not
- impacted, and you can recycle the
- 23 aluminum.
- Going forward, there's a protocol
- 25 for doing light fixture removal and

1 EPA Public Meeting 06.09.14 2 that involves evaluation of the light 3 fixture, the segregation under controlled conditions by trained people 4 who send the material to certified 5 facilities for disposal. So it's not 6 7 done by just regular electricians, it's not done by maintenance people that, you know, it's a wholesale program 9 10 that's designed for and the School Construction Authority has protocols on 11 12 how that operation gets implemented. And it's a detailed thing with 13 14 oversight. Is there another point to your 15 16 question? 17 Oh yeah, I'm sorry, the other 18 question you had said about should your kids be looking up, right, so as part 19 of the ongoing we talked about that 20 21 there is a protocol for removal of all of the fixtures in all of the schools 22 23 by 2016. In the interim there's a protocol 24 25 for inspection and maintenance of those

1 EPA Public Meeting 06.09.14 2 ballasts that are in place on the list 3 to be removed. And that includes having the custodians go around and 4 check them and evaluate them, so that's 5 what they're doing. And if there is 6 some kind of an instance, because a lot 7 of times they'll start to smoke, lights 8 will flicker, the custodians then, 9 there's a protocol on how to address 10 11 that. 12 The room is evacuated. The fixtures removed. The room is 13 14 ventilated. There are all these steps 15 that go into it before the room as been 16 reoccupied, so I don't think your child has to look up because the custodians 17 18 are doing that. AUDIENCE SPEAKER: Are those 19 20 protocols reviewed in the peer review? 21 MR. GERDIS: Are those protocols 22 reviewed in the peer review? 23 AUDIENCE SPEAKER: Right. 24 MR. HAKLAR: The protocols for a 25 light fixture --

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2 AUDIENCE SPEAKER: The inspection --

MR. HAKLAR: We did task the peer

4 reviewers with a question of inspection

of light fixtures, and the peer

6 reviewers, I'm thinking just off the top

of my head, it was something, is visual

8 inspection enough. The peer reviewers

9 had different responses. One may have

10 said pull down the light fixtures,

another may have said, no, that's fine,

12 that's fine.

13 What we have to think in the back
14 of our heads is that it's the middle of
15 2014, so by the end, in two-and-a-half
16 years all of these are going to be
17 gone. So we have the peer reviewers'
18 responses, we've looked at it and we've

19 didn't see a need to address the issue

20 further.

MR. KLUESNER: Dan.

MR. KRAFT: My name is Dan Kraft and

I'm a retired EPA employee for about 30

24 years or so. I managed the Regional EPA

25 PCB enforcement program, I retired in

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2 2010, and I was involved with the initial

3 monitoring of the pilot study.

undertake.

A quick comment on the inspection of the visual inspection of the lights for PCBs, as was mentioned, it's an element in the proposed preferred citywide remedy, it requires periodic visual inspection of all T12 light fixtures, and appears to be a reasonable remedial action to

It's required by the April 11,
2011, New York Department of Education
T12 ballast inspection protocol in all
city public schools.

However, the protocol instructs the custodians and building managers that, quote, this inspection is an external inspection only, underlined.

And you are not to open -- not to open is underlined, any ballast covers or light diffusers to perform your inspections.

This type of a visual inspection

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2 protocol would not have discovered the

3 pervasive PCB leakage in the light

4 fixtures at P.S. 309 and P.S. 199M. If

5 you don't look, you can't see and you

6 won't find.

Authority.

To identify leaking ballasts or prior leakage in a light fixture, you must look inside the ballast cover and actually observe the exposed ballast.

So I call this the City PCB light fixture visual don't look, don't find PCB leak detection program. And I have a question to New York City representatives, but probably they won't be able to answer it because they're from the School Construction

And that is: Why does the protocol forbid the custodians and building managers from opening the fixture where they can readily see if there's any leakage in the fixtures?

Are you able to answer that or do we need -- okay, Department of Education

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person.

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I want to take a step back and quickly provide some comments on this summary report and the New York City pilot study. As a general comment, the May 24, 2013 summary report for the New York City PCB caulk pilot study, in my opinion, is an my artful presentation that often generalizes or oversimplifies negative findings. Ιt state findings or conclusion not supported by their data, references EPA analysis of city data as if to render some legitimacy to their statements fails to provide meaningful data summaries. They summarize the numbers of samples taken, but not the actual data. And referring the reader instead to data compiled in other reports. The summary document does include many accurate statements and supportable conclusions, but in general

it's a document that I believe most

parents, school teachers and staff and

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the general public will find impossible to critically evaluate.

There are two serious flaws in the pilot study design and implementation.

The first one is dilution of PCB air samples with outside air. On finding significant, high, unacceptable PCB air levels in early sampling at all three initial pilot schools, that was P.S.

309K, 199M and 178X, the air sampling conditions were changed to allow large volumes of outside air shown not to contain detectable levels of PCBs into the spaces being tested during the period over which the samples were

actually being collected.

This dilution by outside air resulted in measuring low PCB air levels meeting EPA guidelines. This poisoning of the air data by dilution with outside air makes it useless for evaluating the impact of PCB caulk remediation or removal of other PCB sources such as leaking or leaked PCBs

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2 in light fixures on indoor air quality.

A golden opportunity was missed.

Pilot study implementation changed from one with some possibility of scientific objectiveness to one designed to present the best possible conditions to insure that low PCB air levels meeting EPA guidelines would be found. The impact of this revised strategy, that is air sampling with windows open or with air conditioning units operating is clearly seen in the pre-remedial PCB air levels found in 2011 at P.S. 183Q, which was a window and PCB caulk removal project, and at P.S. 3R, which was to have all of their florescent light fixtures replaced.

All classrooms tested at P.S.

183Q, prior to any remediation, found
air levels below EPA guidelines. At

P.S. 3R, not only did all classroom air
levels meet EPA guidelines prior to any
remediation, the levels were
essentially nondetect for PCBs, the

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2 same level found in outside air. That

3 pre-remedial sampling was conducted

4 with windows open and/or air

5 conditioning -- or air conditioning

6 units operating.

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Post remediation sampling in the classrooms at P.S. 3R were nondetect for PCBs. Supported by these sampling results, one might argue that it is unnecessary to address any PCB caulk or PCB disposal contamination in schools. PCB air levels were shown to be protective by EPA guidelines.

These results suggest that an additional pilot study result and finding be included in the summary report. Specifically that the addition of sufficient outside air to the indoor spaces being tested for their PCB air levels during the actual air sample collection periods can insure that the measured PCB air levels will be low and fully conform to EPA guidelines.

The second major flaw is the

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2 failure to test the existing window

3 caulking at both P.S. 309K and P.S.

4 199M. Both schools had complete window

5 replacements with removal of high level

6 PCB caulk around 2008. The caulk in

7 both schools contained high levels of

8 PCBs.

My recollection, I could be wrong 9 10 on this, in excess of 200,000 parts per million. Since the pilot, PCB caulk 11 removal studies showed that this 12 remedial measure was ineffective in 13 14 eliminating the PCB contamination of 15 the original caulk, that's because PCBs 16 that migrated into the surrounding 17 substrate has a tendency to migrate back into the new PCBs. It could be a 18 significant source of PCBs to inside 19 air in the schools. This source of 20 21 PCBs was not considered by SCA when it 22 performed its relative source strength 23 and modeling analyzes, so the window 24 caulking in these two schools should be 25 immediately tested for PCB content.

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PCB air levels.

Did the pilot study produce any positive results? Yes, definitely.

As Jim Haklar mentioned, the
extensive investigation of possible PCB
sources in the air and air ventilation
studies performed by the City were
important, very important contributions
that advanced the understanding of
these areas and how they might impact

Most importantly in my view,
however, was the discovery of pervasive
leakage of PCBs in the light fixtures,
which focused attention on this
additional separate and likely very
significant source of PCBs in the
schools. Thanks to the efforts of the
New York lawyers for the public
interest, there is now a court ordered
deadline, December of 2016 for the
compete replacement of PCB containing
light fixtures in the city schools.

Another positive result I believe is that in the pre-remedial and other

1 EPA Public Meeting 06.09.14 2 PCB air testing done at the three 3 initial pilot schools without the windows open afforded a glimpse of the 4 unacceptable high PCB levels in the 5 air. They found up to almost 50,000 6 7 nanograms per cubic meter, when the quidance is between 100 and 300 nanograms, to which the occupants might 9 have been exposed over many years in 10 11 the past and may continue to be exposed 12 until leaked PCBs present in the light fixtures and PCBs in PCBs and other 13 materials are removed or sufficient 14 ventilation by outside air is 15 16 continually provided. On leaking PCB ballasts or leaked 17 PCBs in the florescent fixtures, soon 18 19 after the pilot study began in July 20 2010, PCB classroom air measurements 21 that were significantly above the EPA 22 guideline in every classroom tested at P.S. 309 and P.S. 199M led to the 23 24 inspection and the completely 25 unexpected discovery of substantial

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pervasive leakage for PCB containing

3 ballasts and/or evidence of historical

4 leaking in the fluorescent light

fixure.

And to put it in perspective,
recognize that the testing in these
spaces in these pilot schools was only
a sample. It only really looked at
about 15 percent of the classrooms and
other spaces in the school.

At PS -- the percentage of leaking PCB ballasts or non-leaking ballasts with evidence of historical leakage found that in P.S. 309, 62 percent of the ballasts were either PCB leaking ballasts or the fixure was impacted by other leaks.

In P.S. 199M, 68.6 percent were found to be PCB leaking ballasts or other impacted -- impacted by historic leaks. And at P.S. 178X, 43.2 percent was found, but these were only Pre-K, kindergarten and special ed classrooms, so it wasn't the entire school.

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These light fixtures were removed
and replaced as supplemental remedial
measures. In the summer of 2011, the
light fixtures were removed as a
primary remedial measure in P.S. 3R.
At P.S. 3R, 90 percent of the light
fixtures were described as contaminated

and 94.8 of the ballasts were described as impacted.

Now, I think it's very important that EPA and the public get the same kind of information that was collected at the three initial pilot schools so you can understand the significance and how contaminated the situation might be in all the schools.

It was already asked and I also ask that contaminated and impacted be defined in the P.S. 3R context similar to the way it was at P.S. 309 and 199.

Did the City count PCB ballasts, leaking PCB ballasts and non-leaking ballasts with evidence of historical leakage in P.S. 3R as was done in the

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first three pilot schools? If yes,

3 please provide the tally so it can be

4 compared to the findings in the first

5 three schools. If not, why were these

6 counts not taken?

After the window PCBs replacement remedial measure was completed at P.S. 183Q, all the T12 light fixture were also replaced. What was the leaking PCB ballast et cetera tally for this school? Was it taken? Please provided the information if it was.

And as reported in the EPA New
York City PCB program web site, and it
was updated here, as of March the web
site reported that complete PCB light
fixtures replacement had been completed
in 217 school buildings, I think it was
238 at this point, and there were 541
remaining school buildings in which the
PCB light fixture replacement is not
yet complete.

Were the leaking PCB ballasts et cetera tallies taken and recorded for

1 EPA Public Meeting 06.09.14 2 those of the 217 schools not elsewhere 3 already provided, please provide the detailed PCB ballast tallies for each 4 of the schools. If the school list 5 were not complied, why not? Were any 6 7 of the 217 completed buildings that did not have evidence -- were there any of 8 the 217 completed buildings that did 9 not evidence substantial PCB ballast 10 leakage or historical or leaking PCB 11 12 ballasts, the historical leakage 13 indicates that the ballast may have 14 failed in the past and been replaced by the custodian and there may be a new 15 16 ballast, there might be one that 17 contained PCBs or there might be one 18 that did not have any PCBs in the 19 capacitor in the ballast that was replaced. But the leak is evidence 20 21 that a prior PCB ballast may have 22 leaked. 23 EPA enforcement of PCB disposal 24 and use violations regarding city 25 school B12 Florescent light fixtures.

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2 In August of 2010, the PCB PCBs

3 pilot program unexpectedly found

4 significant pervasive leaking or leaked

PCBs in the light fixtures at the three

6 initial pilot schools. Intact,

7 non-leaking PCB florescent light

8 ballasts, more precisely the small PCB

9 capacitor in those ballast, were

10 authorized by regulation in 1979 for

11 continued use.

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However, if such a ballast leaks
PCBs, its use is no longer authorized
and is therefore prohibited by the
Toxic Substances Control Act, and any
leaked PCBs is a violation of PCB

17 disposal requirements.

In January and February of 2011,

EPA inspected nine additional New York

City schools and collected 145 PCB

samples of leaking or leaked material

in the florescent light fixure in those

schools, almost 78 percent of the

samples collected had regulated levels

of PCBs. Leaking or leaked PCBs were

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found at every school where PCB samples
were collected.

.....

The inspection results confirmed the findings at the initial three pilot schools and suggested possible pervasive long-term, possibly since 1979, PCB noncompliance throughout New York City public schools with the potential for significant exposure of students and staff. However, no EPA enforcement action was taken to require an expedited removal of this potential PCB exposure and correction of these violations.

So my question to EPA is why did
EPA not take an enforcement action
addressing the PCB violations in city
school fixures?

I want to make one comment to a comment made in the Manhattan public meeting. One of the gentlemen there kind of suggested that the consultant might not be accurately sampling the data, that they might cook the books.

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was introduced.

In my experience, I found nothing
of that sort. I have no question on
the quality of the data that the
contractor collected and the analysis
that was performed. My problem is with
the sampling protocol, the fact that
the windows were opened and outside air

And there was another question about air testing after window replacement. And I know Miss Donnegan was involved at a school in 2008 or 2009 where there was an active windows replacement ongoing. The parents at P.S. 199 were also involved with an active window replacement and they were complaining that the children would come to school and there would be dust all over the place and they were concerned that the students were being exposed to PCBs.

Well, at the -- at P.S. 183Q, where they did a window replacement job, the pre-remediation testing, all

1 EPA Public Meeting 06.09.14 2 the samples met requirements. after the remediation the air samples, 3 all of them did not meet the 4 requirements and so they had to do a 5 supplemental cleaning. 6 7 So the very rigorous dust control procedures that were used may be need 8 9 to be looked at to see if they're 10 sufficient, and that we might also

suggest that after -- well, first of all, that these replacements only take place when students are not present.

And that after you complete the renovation, that you do air sampling to confirm that you have gotten -- cleaned up the area. And, of course, I would recommend that you don't have the windows open when you do the sampling.

I'm done, thank you.

MR. KLUESNER: The longest stretch without any feedback and we thank you for that.

Any other comments or questions?

Yes, ma'am.

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2 MS. ORLANDO: Again, this has been 3 many years for me so I'm very grateful with the work that's been done with the 4 5 EPA and the City and New York lawyers, and I know it's been a lot of money, but 6 7 it's really all of our money, it's taxpayers' money, it's our kids, it's 8 your kids, it's our families that are 9 teaching there, you know, so I think if 10 we are pulling together and we can find 11 12 solutions, this is good work.

This is far for me, but, you know, scientific studies, here's what I know.

My kid gets a science project, okay.

We're trying to prove something,
hypothesis. I have controls and I have variables. If I change the variables
I've changed the results. So I think
I'm hearing that we're feeding the rooms with clean air and we're getting a clean read or a better read, and that's great because it helps me figure out how I want to solve the problem.

But I have to think about my kid in a

1 EPA Public Meeting 06.09.14 2 third grade classroom post window job 3 every night in the middle of winter, with no ventilation and the heat 4 blasting and not windows open, and dust 5 remnants and particles being left and 6 7 falling in the room from the night before, and I need to know, is there any or will there ever be a reading in 9 a room environment like that, with no 10 ventilation, no air, the heat on. 11 12 we ever going to ever see what could be 13 a possible air reading for kids in a 14 classroom, because I can't say that any 15 classroom in the city or every 16 classroom in the city will always have 17 this perfect ventilation system. We don't even have it here, we 18 19 have a big fan blowing in here to make 20 some air happen. So, I mean, I think 21 we have come forward and you know I'm 22 thankful of you for the work that's 23 been done, but, I mean, do we really 24 know and do we really have any idea if

there's greater contamination in the

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Page 81 EPA Public Meeting 06.09.14 1 2 classroom in a different setting or different time or different day? Thank 3 4 you. MR. KLUESNER: And we'll see if 5 anyone has an answer now or if we need to 6 7 get back in the responsiveness summary, we can do it there. 8 9 Thank you, we will provide a 10 response at a later date. 11 Any other questions or comments 12 before we wrap this up tonight? I want to thank you all for coming 13 14 Thank you for your patience and out. understanding with the audio system. 15 16 Thank you. (Concluded at 8:15 p.m.) 17 18 19 20 21 22 23 24 25

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1	EPA Public Meeting 06.09.14		
2	CERTIFICATE		
3	STATE OF NEW YORK )		
4	)ss:		
5	COUNTY OF RICHMOND)		
6	I, DANIELLE GRANT, a Certified		
7	Shorthand Reporter, and Notary		
8	Public within and for the State of		
9	New York, do hereby certify:		
10	the above statement hereinbefore		
11	set forth, is a true record of the		
12	proceedings.		
13	I further certify that I am not		
14	related to any of the parties to		
15	this action by blood or marriage		
16	and that I am in no way interested		
17	in the outcome of this matter.		
18	In witness whereof, I have hereunto		
19	set my hand this 23rd day of June,		
20	2014.		
21			
22	DANIELLE GRANT		
23	DANTELLE GRANT		
24			
25			

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